

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE: NII HOLDINGS, INC.
SECURITIES LITIGATION

Case No. 1:14-cv-227-LMB-JFA

**CLASS COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
PAYMENT OF LITIGATION EXPENSES AND CLASS REPRESENTATIVES'
REQUESTS FOR REIMBURSEMENT OF EXPENSES**

Pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice and Setting Date for Hearing on Final Approval of Settlement, dated May 16, 2016, Class Counsel, on behalf of themselves and all Plaintiffs' counsel, hereby move this Court for entry of an Order awarding (i) attorneys' fees in the amount of 25% of the Settlement Fund; (ii) payment of litigation expenses incurred by Plaintiffs' counsel; and (iii) reimbursement of costs and expenses to Class Representatives in connection with their representation of the Class in this Action, in accordance with the PSLRA, 15 U.S.C. §78u-4(a)(4).

In support of this Motion, Class Representatives submit (i) the Joint Declaration of Gregory M. Castaldo, Joel H. Bernstein, and Susan R. Podolsky in Support of Proposed Class Action Settlement, Plan of Allocation, and Award of Attorneys' Fees and Expenses, with attached exhibits; (ii) the Memorandum of Law in Support of Class Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses and Class Representatives' Requests for Reimbursement of Expenses; and (iii) all other papers and proceedings herein. A proposed order will be submitted with Class Counsel's reply submission on or before September 9, 2016, after the deadline for objecting has passed.

Dated: August 12, 2016

By: /s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on August 12, 2016.

/s/ Susan R. Podolsky

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